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00-RU-0072
00-RU-B-038

Dr. D. Clark Gibbs, Regulatory Official
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NOV 08 1999

Dear Dr. Gibbs:

**CONTRACT NO. DE-AC06-96RL13308 - W375 - BNFL RESPONSE TO 99-RU-0529,
CONFIGURATION MANAGEMENT SUBORDINATE STANDARD**

Reference: 006284, Letter, D.C. Gibbs, DOE/RU, to M. L. Lawrence, BNFL Inc., "Configuration Management Subordinate Standard," 99-RU-0529, dated September 13, 1999

In the referenced letter, the Regulatory Unit clarified its position regarding the meaning of various words contained in the configuration management standard recently adopted by BNFL Inc. and approved by the Regulatory Unit. The Regulatory Unit indicated how it prefers to interpret certain words in approved standards. Specifically, "should," "normally," and "usually" are considered to denote commitments while "may," "typically," and "recommended" will denote options.

BNFL Inc. believes that the following alternative set of "rules" regarding key words contained in standards is more appropriate.

1. BNFL Inc. will commit to all "shall" statements, unless an exception is specifically taken on a statement.
2. BNFL Inc. will not normally commit to "should" statements, unless they are specifically adopted. In certain cases, like the ISO 10007 configuration management standard, where the strongest definitive statement is a "should," then BNFL Inc. will commit to the "should" statements unless exception is specifically taken.
3. BNFL Inc. will not commit to "may," "typically," "normally," "usually," or "recommended" statements, unless a statement is specifically adopted.
4. Declarative statements contained in standards not otherwise qualified will be treated as commitment statements for BNFL Inc., unless an exception is specifically taken.

BNFL Inc. agrees that standards are not uniform in their terminology. Therefore, BNFL Inc. will use the above rules in future Authorization Basis Amendment Request submittals to identify what portions of a proposed standard BNFL Inc. considers commitment and what portions BNFL Inc. considers optional. This methodology provides a default rule for each type of declarative statement in a standard. As a result, it should be easier for BNFL Inc. and the Regulatory Unit to differentiate between commitments and options.

Should you have any questions or comments, please call me at (509) 371-3589 or Mr. Don Edwards at (509) 371-3741.

Yours sincerely,



A. J. Dobson
Manager, Operations and Safety
BNFL Inc.

MAP/jca

cc:

Barr, R.	DOE/RL	A4-70
Barrett, M.	DOE/ORP	H6-60
Brown, N.	DOE/ORP	H6-60
Dobson, A.	BNFL Inc.	A117
Edwards D.	BNFL Inc.	B140
Landry, W.	BNFL Inc.	Fairfax
Lawrence, M.	BNFL Inc.	A110
Morgan, S.	BNFL Inc.	A116
PDC	BNFL Inc.	K110
Smyser, L.	PNNL	H6-61
Tooze, R.	BNFL Inc.	Fairfax
Trautner, L.	BNFL Inc.	A216